



The Commonwealth of Massachusetts
Executive Office of Environmental Affairs
100 Cambridge Street
Boston, Massachusetts 02202

NEW BEDFORD
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MICHAEL S. DUKAKIS
GOVERNOR

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November 19, 1984

Gerard Sotolongo
New Bedford Project Officer
U.S. EPA-HWM - Room 1907
Superfund Branch
JFK Federal Building
Boston, MA 02203

RE: Draft Feasibility Study of Remedial
Action Alternatives-Acushnet River
Estuary above Coggeshall Street Bridge

Dear Mr. Sotolongo:

Although review of this project pursuant to the Massachusetts Environmental Policy Act has not yet been initiated, I have undertaken review of the Draft Feasibility Study in order to assist the EPA in its project planning. My comments are as follows:

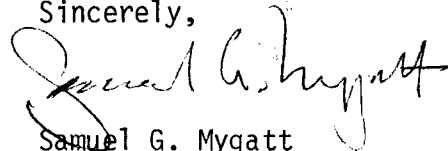
- (1) Hazardous levels of PCB's (over 50 ppm) have been documented in New Bedford Harbor both on the site under study and in areas of the lower and outer harbor. Larger areas of sediments are contaminated at levels which, while not classed as hazardous waste, are still significant. A study of the non-hot spot areas is expected to be complete prior to the actual cleanup of the hot spot area above the Coggeshall Street Bridge. I believe each option for the hot spot cleanup must be evaluated to determine if sufficient space is available for the additional hazardous waste level material. A second site for disposal of contaminated sediments which are not hazardous wastes may be appropriate.
- (2) The report suggest that a disposal site on the side of the harbor may be usable by the public in the future. I believe this use deserves a detailed discussion. Does the site have to be secure? How much monitoring and policing activity will be required in the future? For how long? What types of extra precautions should be taken if the public is allowed access to the site? Does this increase use risk a break in the cover seal?



- (3) Moving the contaminated sediments to an upland site appears acceptable for the PCB's as they tend to bond to the oils and organic sediments. The heavy metals, however, are immobile as sulfides in the marine environment, but can become mobile in a fresh water, acidic environment. Details of the confinement structure are needed to be able to assure that the heavy metals do not become a problem at any inland site.
- (4) More details are needed concerning the precautions to be implemented at the temporary New Bedford containment site to assure that volatilization and dust dispersal do not occur.
- (5) The proposal to invert the position of clean and contaminated sediments by dredging raises unanswered questions. The upper, contaminated, sediments are presumably silts and clay-size particles. Upon movement by hydraulic dredging, they become very dilute and even when placed in dewatering chambers on land can require an extensive time to solidify from the 80% water state so they can be moved or capped. It is not known how long such consolidation may require under water. One suggestion was one year. At some point, cleaner sediments are to be placed as a cap. These may well be denser (sandier) sediments which could displace the contaminated layers, reintroducing an area of contaminated sediments to the upper layer. A structural analysis of this option needs to be done. Additionally, this option does not allow effluent confinement and treatment unless sheet piling is used to isolate each cell until it is completed. The use of sheet piling also may allow closer cell placement.
- (6) More detail of the effluent treatment process is needed. What components would it concentrate? The floatables? The sediments? What concentration of PCB's are expected in the water column? What are the end products? How would they be disposed of?
- (7) Disposal of the sediments in a lined or unlined area on the Fairhaven shore raises two issues related to changes in the tidal prism and in the floodstorage area. The effect of the tidal prism loss should be evaluated (for this option and the channelization option) as it would affect the sedimentation rates and dredging frequencies at the hurricane barrier section of the navigation channel. I would also point out that

FEMA has modeled the flooding situation to the 500 year flood with the barrier closed. Any change in flood levels due to the loss of flood storage should be calculated. If none of the new flooding impacts structures, the communities may only need to adopt the new elevations.

Sincerely,

A handwritten signature in black ink, appearing to read "Samuel G. Mygatt". The signature is fluid and cursive, with a large initial "S" and a long, sweeping underline.

Samuel G. Mygatt
Executive Director
Environmental Impact Review

SGM/bk

cc: T.F. McLoughlin, DEQE
P.T. Anderson, DEQE